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January 31, 2020

BY ECF

Honorable James L. Cott
United States Magistrate Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 21D
New York, New York 10007

Re: David S. Owens v. City of New York, et al.
19-CV-10213 (GBD) (JLC)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the defense in the above- referenced matter. The purpose of this letter is twofold. First, defendant writes in response to the Court's December 2, 2019 *Valentin* Order, [Docket Entry No. 10], whereby this Office was directed to ascertain the identity of the police officer who arrested plaintiff on November 2, 2016, as well as the addresses where these Defendants may be served. Second, defendant writes to request a fourteen (14) day extension of time from January 31, 2020 to February 14, 2020 to complete its investigation concerning the service address of one of the officers in connection with plaintiff's arrest on November 2, 2016. Pursuant to the Court's Order, upon information and belief, please find below the names and service addresses for the following individuals:

Lieutenant Carmine Semioli, Shield No. 5259
New York City Police Department Citywide Traffic Task Force

138 West 30th Street
New York, NY 10001

Police Officer Luis Torres, Shield No. 19168
Bronx Court House 4-E26
215 East 161 Street
Bronx, NY 10451

Police Officer, Lindsey Robbles, Shield No.9206
24th Precinct
151 West 100th Street
New York, NY 10025

Police Officer Juan Diaz, Shield No. 4060

The reason defendant seeks an additional 14 days to complete its investigation is to confirm the service address of Police Officer Juan Diaz. Officer Diaz was involved with plaintiff's November 2, 22016 arrest, yet this officer is no longer a member of the New York City Police Department. At this juncture, defendant has identified and provided above the names of four of the officers and respectfully requests that the Court grant defendant's request for a fourteen (14) day extension of time from January 31, 2020 to February 14, 2020 to provide the service address for Officer Juan Diaz.

Thank you for your consideration herein.

Respectfully submitted,

Suzanne Funes
Suzanne E. Funes
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BY FIRST CLASS MAIL

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